Case 2:25-mj-30304-DUTY ECF No. 1 Page D 1 Filed 05/09/25 Page 1 of 6 Nush Page D 1 Filed 05/09/25 Page 1 of 6 (313) 226-9100

(DJ)

Printed name and title

AO 91 (Rev. 11/11) Criminal Complaint Special Agent: Daniel Ghareeb Telephone: (866) 347-2423

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America		Case: 2:25-mj-30304	
V.		Assigned To: Unassigned	
Gurshinder Singh	Case No.	Assign. Date : 5/9/2025	
		Description: CMP USA V. SINGH	

CRIMINAL COMPLAINT

CRIMINAL COMPLAINT								
I, the con	mplainant in this c	ase, state that	the following is tr	rue to the best of my knowled	ge and belief.			
On or ab	out the date(s) of		May 9, 2025	in the county of	Wayne	in the		
Eastern	District of	Michigan	, the defenda	ant(s) violated:				
Code Section		Offense Description						
21 U.S.C. § 841(a)(1)		Possession with intent to distribute controlled substances.						
This crir	ninal complaint is	based on thes	e facts:					
THIS CITI	illiai compianii is	based on thes	c facts.					
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Continued on the attached sheet.	et.		I Alle					
			Complainant's .	signature				
			Daniel Ghareeb, Sp. Printed name of	ecial Agent				
Sworn to before me and signed in my presence		sence		Frintea name o	ana iiiie			
and/or by reliable electronic means.			King IN A	此				
Date:			Judge's sign	nature				
City and state: Det	troit, MI		Н	Ion. Kimberly G. Altman, Unite	d States Magistra	te Judge		

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Daniel Ghareeb, being sworn, depose and state the following:

INTRODUCTION

- 1. This affidavit is in support of a criminal complaint charging Gurshinder SINGH with possession with intent to distribute cocaine, a schedule II controlled substance in violation of Title 21, United States Code, Sections. 841(a)(1) and (b)(1)(A).
- 2. I am currently a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI") in Detroit, Michigan. I have been a Special Agent with HSI since 2007. Prior to my current assignment, I was a police officer with the North Baltimore Ohio Police Department for approximately two years. I hold a Bachelor and Master of Science in Criminal Justice. I have received specialized training about illegal drug trafficking and money laundering at the Federal Law Enforcement Training Center located in Brunswick, Georgia. I have led and participated in numerous investigations related to illegal drug trafficking as well as methods used to finance drug transactions and launder drug proceeds.
- 3. I make this affidavit based on my participation in this investigation, as well as information received from other law enforcement officials and/or their reports and records. The information outlined herein is provided for the limited purpose of establishing probable cause and does not

contain all information known to law enforcement pertaining to this investigation.

4. As set forth in more detail below, this investigation has shown that on or about May 9, 2025, Gurshinder SINGH attempted to exit the United States to Canada via the Detroit Ambassador Bridge, located in the Eastern District of Michigan. There is probable cause to conclude SINGH possessed with an intent to distribute cocaine in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

PROBABLE CAUSE

5. On May 9, 2025, the Detroit Contraband Enforcement Team (DCET) were conducting outbound enforcement operations at the Detroit Ambassador Bridge beginning at 6:15 that morning. At approximately 6:55 AM, DCET Customs and Border Protection Officers (CBPO) made contact with the driver of a commercial tractor (Ontario PB14873) hauling an Ontario plated trailer (Ontario T2350X). The driver of the tractor trailer was later identified as Gurshinder SINGH. When asked where he was coming from and what he was hauling, SINGH stated he was coming from Wisconsin, and when asked where he stopped for the night, SINGH replied "huh". After repeating the question, SINGH stated he stayed in Indiana for the night.

- 6. Once SINGH was parked, he was met by CBP Officers who instructed him to exit the truck. Officers opened the passenger-side toolbox compartment of the trailer. Once opened, they discovered Home Depot moving boxes, hidden behind rubber mats. CBP Officers opened a box and found vacuum sealed duct tape brick bundles, consistent with narcotics packaging. After this discovery CBP Officers placed SINGH in handcuffs. As officers walked SINGH to the transport vehicle, he asked "What's going on? Am I under arrest? Was there something in the Home Depot boxes?"
- 7. Eight Home Depot Boxes were removed from the trailer passenger side tool compartment. The individually wrapped bundles were weighed with a total weight of 173.25 kilograms. Narcotics Trunarc testing was conducted on three of the individually wrapped bundles from three separate boxes. All three bundles returned positive results for cocaine.
- 8. At Approximately 9:43 AM, HSI Special Agents attempted to interview SINGH. SINGH was advised of his Miranda statement of rights and stated he wanted an attorney.
- 9. An examination of SINGH's telephone showed that he was in contact with a telephone number through Signal Messaging Service. This communication began on May 6, 2025, at approximately 12:31 AM. This communication then continued with three calls and then a message that was

received stating "Bro next load mera Friday deliver ho rea". The next message received stating "so may be we caneet Thursday evening or night". On May 8, 2025, this unknown number sent the location of a truck stop in Indiana to SINGH. Based on my training and experience, this conversation was to coordinate a meeting between SINGH and this unknown individual.

- 10. Based on my training and experience, the volume of controlled substances and the manner in which they were being transported from the United States to Canada is indicative of a broader drug trafficking effort that is involved in the further distribution of the controlled substances.
- 11. Based on my experience, drug trafficking organizations transport drug shipments, such as the one in this incident valued at approximately three-million-dollars' worth of cocaine, in a coordinated manner. Because of the extremely high value of the drug shipment, every individual involved in the transportation of cocaine are known and trusted by the organization and reimbursed monetarily by the organization.

CONCLUSION

12. Based on the above, probable cause exists to show that Gurshinder SINGH possessed with the intent to distribute cocaine in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

Daniel Ghareeb Special Agent

Homeland Security Investigations

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Subscribed and sworn to before me or by reliable electronic means.

Honorable Kimberly G. Altman United States Magistrate Judge

Date: May 9, 2025